

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

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| KRYSTAL SELLERS-KOMINEK, |) | Case No. 21-cv-00047 |
| Plaintiff, |) | Judge James R. Knepp |
| vs. |) | <u>DEFENDANT CITY OF MAUMEE'S</u> |
| CITY OF MAUMEE, |) | <u>REQUEST FOR FIRST EXTENSION</u> |
| Defendant. |) | <u>OF TIME TO MOVE, PLEAD, OR</u> |
| | | <u>OTHERWISE RESPOND TO</u> |
| | | <u>PLAINTIFF'S COMPLAINT</u> |

* * * * *

Defendant, City of Maumee (“Defendant”), respectfully requests that the Court grant it an extension of time of 30 days, through and including February 24, 2021, to move, plead, or otherwise respond to Plaintiff’s Complaint. Defendant has filed its Notice of Removal to remove this action to federal court concurrently with this request.

Defendant received a copy of Plaintiff’s Complaint on December 28, 2020. Setting aside any potential service-related arguments or defenses, Defendant’s answer or other response to the Complaint would have been due in state court on January 25, 2021.

In support of the requested extension, Defendant states that it has recently retained the undersigned counsel related to this lawsuit. Defendant is in the process of compiling information and communicating with counsel regarding the allegations in the Complaint. Counsel further requests additional time so that they may have an opportunity to review any information and documents that Defendant is compiling and so that they can properly evaluate the claims in this

litigation and Defendant's response to Plaintiff's Complaint. Defendant is not requesting this extension for purposes of delay, and no prejudice will result if it is granted.

Respectfully submitted,

/s/ Jennifer A. McHugh

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Attorneys for Defendant City of Maumee

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 8th day of January, 2021, by electronic mail and regular U.S. Mail, upon:

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Attorney for Plaintiff

/s/ Jennifer A. McHugh

Jennifer A. McHugh

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